

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA and  
STATE OF MICHIGAN, ex rel,  
ASHWANI SHEORAN, RPh,

Plaintiff-Relator,

vs.

Case No. 13-10568

Hon. John Corbett O'Meara

Magistrate Judge Michael Hluchaniuk

WAL-MART STORES EAST, LP, d/b/a  
WALMART, a foreign corporation,  
DEFENDANT TOI WALKER, DOUG HENGER,  
ALFRED RODRIGUEZ,  
RICHARD LOCKARD, M.D.,  
NAVEED MAHFOOZ, M.D., and  
TAREK EZZEDDINE, M.D.,

Jointly and Severally,

Defendants.

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**RICHARD LOCKARD M.D.'S UNOPPOSED**  
**MOTION FOR EXTENSION OF TIME TO**  
**RESPOND TO PLAINTIFF'S FIRST AMENDED**  
**COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendant, Richard Lockard M.D., by and through counsel, respectfully moves for an extension of time to respond to Plaintiff's First Amended Complaint ("FAC"). In support of said Motion, Dr. Lockard states as follows:

1. Plaintiff served his 34-page FAC on or about July 5, 2018. (Doc. 3.)
2. Pursuant to Fed. R. Civ. P. 12(a)(1)(A), Dr. Lockard must respond within 21 days after being served.

3. Dr. Lockard's response to Plaintiff's FAC is currently due on July 26, 2018.

4. Due to the complex nature of the complaint and the general order of business, counsel for Dr. Lockard respectfully requests a relatively short extension of time to respond by September 10, 2018.

5. Counsel for Dr. Lockard has consulted with counsel for Plaintiff, who indicates that Plaintiff has no objection to this requested extension of time.

WHEREFORE, Defendant, Dr. Lockard, respectfully requests an extension of time within which to respond to Plaintiff's FAC to and including September 10, 2018.

Dated: July 17, 2018

THE HEALTH LAW PARTNERS, P.C.

By: /s/James R. Witham  
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**CERTIFICATE OF SERVICE**

I certify that on the 17<sup>th</sup> day of July 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send email notification of electronic filing to counsel for all parties of record.

/s/Marianna M. McIntyre

Marianna M. McIntyre

Legal Secretary

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